

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE BAYOU HEDGE FUND INVESTMENT : MDL No. 1755 (CM)  
LITIGATION :  
:  
----- X

THIS DOCUMENT RELATES TO:  
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BROAD-BUSSEL FAMILY LIMITED :  
PARTNERSHIP, MARIE LOUISE, :  
MICHELSON, MICHELLE MICHELSON, and :  
HERBERT BLAINE LAWSON, JR., Individually :  
and on Behalf of All Other Persons and Entities :  
Similarly Situated, :

Plaintiffs, :

- against - :

BAYOU GROUP LLC, et al., :

Defendants. :  
:  
----- X

No. 06 Civ. 3026 (CM)

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

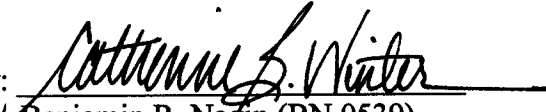
PLEASE TAKE NOTICE that, upon the annexed affidavits of Catherine B.

Winter and Mark B. Blocker, with exhibits annexed thereto, the undersigned will move this Court before the Honorable Colleen McMahon at the United States Courthouse, 300 Quarropas Street, White Plains, New York, at a date and time to be determined by the Court, for an order, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, granting Mark B. Blocker admission pro hac vice to the bar of this Court on behalf of defendant Citibank, N.A.

Dated: New York, New York  
April 26, 2006

Respectfully submitted,

SIDLEY AUSTIN LLP

By:   
Benjamin R. Nagin (BN 0539)  
Catherine B. Winter (CW 3053)  
787 Seventh Avenue  
New York, New York 10019  
(212) 839-5300

Mark B. Blocker  
Sidley Austin LLP  
10 South Dearborn Street  
Chicago, Illinois 60603  
(312) 853-7000

John K. Van De Weert  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
(202) 736-8000

*Attorneys for Defendant Citibank, N.A.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**IN RE BAYOU HEDGE FUND INVESTMENT  
LITIGATION**

MDL No. 1755 (CM)

**THIS DOCUMENT RELATES TO:**

**BROAD-BUSSEL FAMILY LIMITED :  
PARTNERSHIP, MARIE LOUISE, :  
MICHELSON, MICHELLE MICHELSON, and :  
HERBERT BLAINE LAWSON, JR., Individually :  
and on Behalf of All Other Persons and Entities :  
Similarly Situated, :**

No. 06 Civ. 3026 (CM)

**AFFIDAVIT OF CATHERINE B. WINTER**

**Plaintiffs,**

- against -

**BAYOU GROUP LLC, et al.,**

## Defendants.

[illegible]

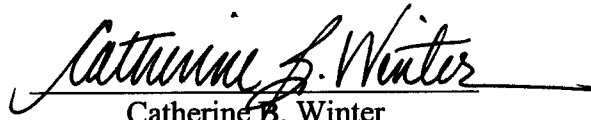
**Catherine B. Winter, being duly sworn, hereby deposes and says:**

1. I am an attorney admitted to practice in the state of New York and in this Court, and associated with the law firm of Sidley Austin LLP, counsel for defendant Citibank, N.A. (“Citibank”) in this action. I respectfully submit this affidavit in support of Citibank’s motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for an order granting Mark B. Blocker admission pro hac vice to the bar of this Court on behalf of Citibank.

2. I am a member in good standing of the bar of this Court.

3. Mark B. Blocker is a member in good standing of the bar of the State of Illinois. Mr. Blocker's Affidavit, sworn to on April 25, 2006, with Certificate of Good Standing for the bar of the State of Illinois is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that this Court grant Citibank's motion for an order permitting Mark B. Blocker to appear in this action pro hac vice on behalf of Citibank.

  
Catherine B. Winter

Subscribed and sworn to before me  
this 26<sup>th</sup> day of April, 2006

  
Notary Public

**ERLINDA F. RABANO**  
Notary Public, State of New York  
No. 01RA4998999  
Qualified in Queens County  
Certificate Filed in New York County  
Commission Expires July 13, 2008

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
IN RE BAYOU HEDGE FUND INVESTMENT	:	MDL No. 1755 (CM)
LITIGATION	:	

THIS DOCUMENT RELATES TO:

BROAD-BUSSEL FAMILY LIMITED : No. 06 Civ. 3026 (CM)  
 PARTNERSHIP, MARIE LOUISE, :  
 MICHELSON, MICHELLE MICHELSON, and : **AFFIDAVIT OF MARK B.**  
 HERBERT BLAINE LAWSON, JR., Individually : **BLOCKER**  
 and on Behalf of All Other Persons and Entities :  
 Similarly Situated, :

**Plaintiffs,**

- against -

**BAYOU GROUP LLC, et al.,**

**Defendants.**

STATE OF ILLINOIS                    )  
  ) s.s.:  
COUNTY OF COOK                    )

**Mark B. Blocker, being duly sworn, hereby deposes and says:**

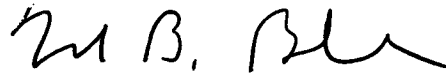
1. I am an attorney admitted to practice in the State of Illinois and a partner of the law firm of Sidley Austin LLP, counsel for defendant Citibank, N.A. (“Citibank”) in this action.

2. I make this affidavit in support of Citibank's motion for an order permitting me to appear in this action as counsel on behalf of Citibank pro hac vice.

3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1,  
I am a member in good standing of the Bar of the State Illinois.

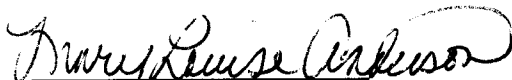
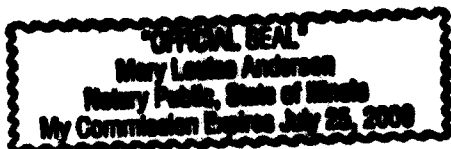
4. There are no pending disciplinary proceedings against me in any State or  
Federal court.

5. Wherefore your affiant respectfully requests that he be permitted to appear  
as counsel and advocate pro hac vice in this matter.



Mark B. Blocker

Subscribed and sworn to before me  
this 25<sup>th</sup> day of April, 2006

  
Notary Public

## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Bruce Blocker

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1988 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Monday, April 24, 2006.

*Juleann Hornyak*  
Clerk